

DRAFT/PROPOSED CAAPP PERMIT
March 10, 2014

Attention:

VVF Illinois Service, LLC
Attn: Curtis Kondray
2000 Aucutt Road
Montgomery, Illinois 60538

State of Illinois

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Source:

VVF Illinois Services, LLC
2000 Aucutt Road
Montgomery, Illinois 60538

I.D. No.: 089800AAH
Permit No.: 96030154

Permitting Authority:

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
217/785-1705

CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

Type of Application: Renewal
Purpose of Application: Renew Existing CAAPP Permit for 5 Years

ID No.: 089800AAH
Permit No.: 96030154
Statement of Basis No.: 96030154-1312

Date Application Received: April 06, 2007
Date Issued: TBD

Expiration Date: TBD
Renewal Submittal Date: 9 Months Prior to TBD

Source Name: VVF Illinois Services, LLC
Address: 2000 Aucutt Road
City: Montgomery
County: Kane
ZIP Code: 60538

This permit is hereby granted to the above-designated source authorizing operation in accordance with this CAAPP permit, pursuant to the above referenced application. This source is subject to the conditions contained herein. For further information on the source see Section 1 and for further discussion on the effectiveness of this permit see Condition 2.3(g).

If you have any questions concerning this permit, please contact Rosario Johnstone at 217/785-1705.

Raymond E. Pilapil
Acting Manager, Permit Section
Division of Air Pollution Control

ECB:MTR:RJ:psj

cc: IEPA, Permit Section
IEPA, FOS, Region 1
Lotus Notes Database1

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Section 1 - Source Information

1. Addresses

Source

VVF Illinois Services, LLC
 2000 Aucutt Road
 Montgomery, Illinois 60538-1133

Owner

The Dial Corporation
 15501 North Dial Boulevard
 Scottsdale, Arizona 85260

Operator

The Dial Corporation
 2000 Aucutt Road
 Montgomery, Illinois 60538-1133

Permittee

The Owner or Operator of the source as identified in this table.

2. Contacts

Certified Officials

The source shall submit an Administrative Permit Amendment for any change in the Certified Officials, pursuant to Section 39.5(13) of the Act.

	<i>Name</i>	<i>Title</i>
<i>Responsible Official</i>	Curtis Konrardy	Plant Manager
<i>Delegated Authority</i>	No other individuals have been authorized by the IEPA.	N/A

Other Contacts

	<i>Name</i>	<i>Phone No.</i>	<i>Email</i>
<i>Source Contact</i>	Jeffery R. DeJule	630-801-4676	Jeff.DeJule@vvfllc.com
<i>Technical Contact</i>	Jeffery R. DeJule	630-801-4676	Jeff.DeJule@vvfllc.com
<i>Correspondence</i>	Jeffery R. DeJule	630-801-4676	Jeff.DeJule@vvfllc.com
<i>Billing</i>	Jeffery R. DeJule	630-801-4676	Jeff.DeJule@vvfllc.com

3. Single Source

The source identified in Condition 1.1 above shall be defined to include all the following additional source(s):

<i>I.D. No.</i>	<i>Permit No.</i>	<i>Single Source Name and Address</i>
N/A	N/A	N/A

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Section 2 - General Permit Requirements

1. Prohibitions

- a. It shall be unlawful for any person to violate any terms or conditions of this permit issued under Section 39.5 of the Act, to operate the CAAPP source except in compliance with this permit issued by the IEPA under Section 39.5 of the Act or to violate any other applicable requirements. All terms and conditions of this permit issued under Section 39.5 of the Act are enforceable by USEPA and citizens under the Clean Air Act, except those, if any, that are specifically designated as not being federally enforceable in this permit pursuant to Section 39.5(7)(m) of the Act. [Section 39.5(6)(a) of the Act]
- b. After the applicable CAAPP permit or renewal application submittal date, as specified in Section 39.5(5) of the Act, the source shall not operate this CAAPP source without a CAAPP permit unless the complete CAAPP permit or renewal application for such source has been timely submitted to the IEPA. [Section 39.5(6)(b) of the Act]
- c. No Owner or Operator of the CAAPP source shall cause or threaten or allow the continued operation of an emission source during malfunction or breakdown of the emission source or related air pollution control equipment if such operation would cause a violation of the standards or limitations applicable to the source, unless this CAAPP permit granted to the source provides for such operation consistent with the Act and applicable Illinois Pollution Control Board regulations. [Section 39.5(6)(c) of the Act]
- d. Pursuant to Section 39.5(7)(g) of the Act, emissions from the source are not allowed to exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder, consistent with Section 39.5(17) of the Act and applicable requirements, if any.

2. Emergency Provisions

Pursuant to Section 39.5(7)(k) of the Act, the Owner or Operator of the CAAPP source may provide an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations under this CAAPP permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:

- a.
 - i. An emergency occurred and the source can identify the cause(s) of the emergency.
 - ii. The source was at the time being properly operated.
 - iii. The source submitted notice of the emergency to the IEPA within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
 - iv. During the period of the emergency the source took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or requirements in this permit.
- b. For purposes of Section 39.5(7)(k) of the Act, "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, such as an act of God, that requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operation error.
- c. In any enforcement proceeding, the source seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency or

upset provision contained in any applicable requirement. This provision does not relieve the source of any reporting obligations under existing federal or state laws or regulations.

3. General Provisions

a. Duty to Comply

The source must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. [Section 39.5(7)(o)(i) of the Act]

b. Need to Halt or Reduce Activity is not a Defense

It shall not be a defense for the source in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

c. Duty to Maintain Equipment

The source shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements. [Section 39.5(7)(a) of the Act]

d. Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under. [Section 39.5(7)(a) of the Act]

e. Duty to Pay Fees

- i. The source must pay fees to the IEPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi) of the Act]
- ii. The IEPA shall assess annual fees based on the allowable emissions of all regulated air pollutants, except for those regulated air pollutants excluded in Section 39.5(18)(f) of the Act and insignificant activities in Section 6, at the source during the term of this permit. The amount of such fee shall be based on the information supplied by the applicant in its complete CAAPP permit application. [Section 39.5(18)(a)(ii)(A) of the Act]
- iii. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois EPA, P.O. Box 19276, Springfield, IL, 62794-9276. Include on the check: ID #, Permit #, and "CAAPP Operating Permit Fees". [Section 39.5(18)(e) of the Act]

f. Obligation to Allow IEPA Surveillance

Pursuant to Sections 4(a), 39.5(7)(a), and 39.5(7)(p)(ii) of the Act, inspection and entry requirements that necessitate that, upon presentation of credentials and other documents as may be required by law and in accordance with constitutional limitations, the source shall allow the IEPA, or an authorized representative to perform the following:

- i. Enter upon the source's premises where the emission unit(s) are located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
- iv. Sample or monitor any substances or parameters at any location at reasonable times:
 - A. As authorized by the Clean Air Act or the Act, at reasonable times, for the purposes of assuring compliance with this CAAPP permit or applicable requirements; or
 - B. As otherwise authorized by the Act.
- v. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

g. Effect of Permit

- i. Pursuant to Section 39.5(7)(j)(iv) of the Act, nothing in this CAAPP permit shall alter or affect the following:
 - A. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section.
 - B. The liability of the Owner or Operator of the source for any violation of applicable requirements prior to or at the time of permit issuance.
 - C. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act.
 - D. The ability of USEPA to obtain information from the source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- ii. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Sections 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. [35 IAC 201.122 and Section 39.5(7)(a) of the Act]

h. Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, other portions of this permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the source shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

4. <u>Testing</u>

- a. Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of

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any tests conducted as required by this permit or as the result of a request by the IEPA shall be submitted as specified in Condition 7.1 of this permit. [35 IAC Part 201 Subpart J and Section 39.5(7)(a) of the Act]

- b. Pursuant to Section 4(b) of the Act and 35 IAC 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
 - i. **Testing by Owner or Operator:** The IEPA may require the Owner or Operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the IEPA, at such reasonable times as may be specified by the IEPA and at the expense of the Owner or Operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The IEPA shall have the right to observe all aspects of such tests.
 - ii. **Testing by the IEPA:** The IEPA shall have the right to conduct such tests at any time at its own expense. Upon request of the IEPA, the Owner or Operator of the emission source or air pollution control equipment shall provide, without charge to the IEPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

5. Recordkeeping

a. Control Equipment Maintenance Records

Pursuant to Section 39.5(7)(b) of the Act, a maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates maintenance was performed and the nature of preventative maintenance activities.

b. Retention of Records

- i. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [Section 39.5(7)(e)(ii) of the Act]
- ii. Pursuant to Section 39.5(7)(a) of the Act, other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a different period is specified by a particular permit provision.

c. Availability of Records

- i. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall retrieve and provide paper copies, or as electronic media, any records retained in an electronic format (e.g., computer) in response to an IEPA or USEPA request during the course of a source inspection.
- ii. Pursuant to Section 39.5(7)(a) of the Act, upon written request by the IEPA for copies of records or reports required to be kept by this permit, the Permittee shall promptly submit a copy of such material to the IEPA. For this purpose, material shall be submitted to the IEPA within 30 days unless additional time is provided by the IEPA or the Permittee believes that the volume and nature of

requested material would make this overly burdensome, in which case, the Permittee shall respond within 30 days with the explanation and a schedule for submittal of the requested material. (See also Condition 2.9(d))

6. Certification

a. Compliance Certification

- i. Pursuant to Section 39.5(7)(p)(v)I of the Act, the source shall submit annual compliance certifications by May 1 unless a different date is specified by an applicable requirement or by a particular permit condition. The annual compliance certifications shall include the following:
 - A. The identification of each term or condition of this permit that is the basis of the certification.
 - B. The compliance status.
 - C. Whether compliance was continuous or intermittent.
 - D. The method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- ii. Pursuant to Section 39.5(7)(p)(v)(D) of the Act, all compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the IEPA Compliance Section. Addresses are included in Attachment 3.
- iii. Pursuant to Section 39.5(7)(p)(i) of the Act, all compliance reports required to be submitted shall include a certification in accordance with Condition 2.6(b).

b. Certification by a Responsible Official

Any document (including reports) required to be submitted by this permit shall contain a certification by the responsible official of the source that meets the requirements of Section 39.5(5) of the Act and applicable regulations. [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included in Attachment 4 of this permit.

7. Permit Shield

- a. Pursuant to Section 39.5(7)(j) of the Act, except as provided in Condition 2.7(b) below, the source has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the IEPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit. This permit shield does not extend to applicable requirements which are promulgated after **Error! Bookmark not defined.** (date USEPA notice started), unless this permit has been modified to reflect such new requirements.
- b. Pursuant to Section 39.5(7)(j) of the Act, this permit and the terms and conditions herein do not affect the Permittee's past and/or continuing obligation with respect to statutory or regulatory requirements governing major source construction or modification under Title I of the CAA. Further, neither the issuance of this permit nor any of the terms or conditions of the permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of permit issuance.

- c. Pursuant to Section 39.5(7)(a) of the Act, the issuance of this permit by the IEPA does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the IEPA or the USEPA may have against the applicant including, but not limited to, any enforcement action authorized pursuant to the provision of applicable federal and state law.

8. Title I Conditions

Pursuant to Sections 39(a), 39(f), and 39.5(7)(a) of the Act, as generally identified below, this CAAPP permit may contain certain conditions that relate to requirements arising from the construction or modification of emission units at this source. These requirements derive from permitting programs authorized under Title I of the Clean Air Act (CAA) and regulations thereunder, and Title X of the Illinois Environmental Protection Act (Act) and regulations implementing the same. Such requirements, including the New Source Review programs for both major (i.e., PSD and nonattainment areas) and minor sources, are implemented by the IEPA.

- a. This permit may contain conditions that reflect requirements originally established in construction permits previously issued for this source. These conditions include requirements from preconstruction permits issued pursuant to regulations approved or promulgated by USEPA under Title I of the CAA, as well as requirements contained within construction permits issued pursuant to state law authority under Title X of the Act. Accordingly, all such conditions are incorporated into this CAAPP permit by virtue of being either an "applicable Clean Air Act requirement" or an "applicable requirement" in accordance with Section 39.5 of the Act. These conditions are identifiable herein by a designation to their origin of authority.
- b. This permit may contain conditions that reflect necessary revisions to requirements established for this source in preconstruction permits previously issued under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIR".
 - i. Revisions to original Title I permit conditions are incorporated into this permit through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Revised Title I permit conditions shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.
- c. This permit may contain conditions that reflect new requirements for this source that would ordinarily derive from a preconstruction permit established under the authority of Title I of the CAA. These conditions are specifically designated herein as "TIN".
 - i. The incorporation of new Title I requirements into this CAAPP permit is authorized through the combined legal authority of Title I of the CAA and Title X of the Act. Public participation requirements and appeal rights shall be governed by Section 39.5 of the Act.
 - ii. Any Title I conditions that are newly incorporated shall remain in effect through this CAAPP permit, and are therefore enforceable under the same, so long as such conditions do not expire as a result of a failure to timely submit a complete renewal application or are not removed at the applicant's request.

9. Reopening and Revising Permit

a. Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the source for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

b. Reopening and Revision

Pursuant to Section 39.5(15)(a) of the Act, this permit must be reopened and revised if any of the following occur:

- i. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- ii. Additional requirements become applicable to the source for acid deposition under the acid rain program;
- iii. The IEPA or USEPA determines that this permit contains a material mistake or that an inaccurate statement was made in establishing the emission standards or limitations, or other terms or conditions of this permit; or
- iv. The IEPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

c. Inaccurate Application

Pursuant to Sections 39.5(5)(e) and (i) of the Act, the IEPA has issued this permit based upon the information submitted by the source in the permit application referenced on page 1 of this permit. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation or reopening of this CAAPP under Section 39.5(15) of the Act.

d. Duty to Provide Information

The source shall furnish to the IEPA, within a reasonable time specified by the IEPA any information that the IEPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the source shall also furnish to the IEPA copies of records required to be kept by this permit. [Section 39.5(7)(o)(v) of the Act]

10. Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

11. Permit Renewal

- a. Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of the most recent issued CAAPP permit will remain in effect until the issuance of a renewal permit. [Sections 39.5(5)(1) and (o) of the Act]

- b. For purposes of permit renewal, a timely application is one that is submitted no less than 9 months prior to the date of permit expiration. [Section 39.5(5)(n) of the Act]

12. Permanent Shutdown

Pursuant to Section 39.5(7)(a) of the Act, this permit only covers emission units and control equipment while physically present at the source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

13. Startup, Shutdown, and Malfunction

Pursuant to Section 39.5(7)(a) of the Act, in the event of an action to enforce the terms or conditions of this permit, this permit does not prohibit a Permittee from invoking any affirmative defense that is provided by the applicable law or rule.

Section 3 - Source Requirements

1. Applicable Requirements

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive Particulate Matter

- i. Pursuant to 35 IAC 212.301 and 35 IAC 212.314, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source unless the wind speed is greater than 25 mph.
- ii. Compliance Method (Fugitive Particulate Matter)

Upon request by the IEPA, the Permittee shall conduct observations at the property line of the source for visible emissions of fugitive particulate matter from the source to address compliance with 35 IAC 212.301. For this purpose, daily observations shall be conducted for a week for particular area(s) of concern at the source, as specified in the request, observations shall begin either within one day or three days of receipt of a written request from the IEPA, depending, respectively, upon whether observations will be conducted by employees of the Permittee or a third-party observer hired by the Permittee to conduct observations on its behalf. The Permittee shall keep records for these observations, including identity of the observer, the date and time of observations, the location(s) from which observations were made, and duration of any fugitive emissions event(s).

b. Ozone Depleting Substances

Pursuant to 40 CFR 82.150(b), the Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- i. Pursuant to 40 CFR 82.156, persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices.
- ii. Pursuant to 40 CFR 82.158, equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment.
- iii. Pursuant to 40 CFR 82.161, persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program.
- iv. Pursuant to 40 CFR 82 Subpart B, any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner shall comply with 40 CFR 82 Subpart B, Servicing of Motor Vehicle Air Conditioners.
- v. Pursuant to 40 CFR 82.166, all persons shall comply with the reporting and recordkeeping requirements of 40 CFR 82.166.

c. Asbestos Demolition and Renovation

- i. Asbestos Fees. Pursuant to Section 9.13(a) of the Act, for any site for which the Owner or Operator must file an original 10-day notice of intent to renovate or

demolish pursuant to Condition 3.1(c)(ii) below and 40 CFR 61.145(b), the owner or operator shall pay to the IEPA with the filing of each 10-day notice a fee of \$150.

- ii. Pursuant to 40 CFR 61 Subpart M, Standard of Asbestos, prior to any demolition or renovation at this facility, the Permittee shall fulfill notification requirements of 40 CFR 61.145(b).
- iii. Pursuant to 40 CFR 61.145I, during demolition or renovation, the Permittee shall comply with the procedures for asbestos emission control established by 40 CFR 61.145I.

d. Future Emission Standards

Pursuant to Section 39.5(15)(a) of the Act, this source shall comply with any new or revised applicable future standards of 40 CFR 60, 61, 62, or 63; or 35 IAC Subtitle B after the date issued of this permit. The Permittee shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 2.6(a). This permit may also have to be revised or reopened to address such new regulations in accordance to Condition 2.9.

2. Applicable Plans and Programs

Pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act, the Permittee shall comply with the following applicable requirements. These requirements are applicable to all emission units (including insignificant activities unless specified otherwise in this Section) at the source.

a. Fugitive PM Operating Program

Should this source become subject to 35 IAC 212.302, the Permittee shall prepare and operate under a Fugitive PM Operating Program consistent with 35 IAC 212.310 and submitted to the IEPA for its review. The Fugitive PM Operating Program shall be designed to significantly reduce fugitive particulate matter emissions, pursuant to 35 IAC 212.309(a). Any future Fugitive PM Operating Program made by the Permittee during the permit term is automatically incorporated by reference provided the Fugitive PM Operating Program is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the Fugitive PM Operating Program. In the event that the IEPA notifies the Permittee of a deficiency with any Fugitive PM Operating Program, the Permittee shall be required to revise and resubmit the Fugitive PM Operating Program within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.

b. PM₁₀ Contingency Measure Plan

Should this source become subject to 35 IAC 212.700, then the Permittee shall prepare and operate under a PM₁₀ Contingency Measure Plan reflecting the PM₁₀ emission reductions as set forth in 35 IAC 212.701 and 212.703. The Permittee shall, within 90 days after the date this source becomes subject to 35 IAC 212.700, submit a request to modify this CAAPP permit in order to include a new, appropriate PM₁₀ Contingency Measure Plan.

c. Episode Action Plan

- i. Pursuant to 35 IAC 244.141, the Permittee shall have on file with the IEPA an Episode Action Plan for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The Episode Action Plan shall contain the information specified in 35 IAC 244.144.
- ii. The Permittee shall immediately implement the appropriate steps described in the Episode Action Plan should an air pollution alert or emergency be declared, as

required by 35 IAC 244.169, or as may otherwise be required under 35 IAC 244, Appendix D.

- iii. Pursuant to 35 IAC 244.143(d), if an operational change occurs at the source which invalidates the Episode Action Plan, a revised Episode Action Plan shall be submitted to the IEPA for review within 30 days of the change and is automatically incorporated by reference provided the revision is not expressly disapproved, in writing, by the IEPA within 30 days of receipt of the revision. In the event that the IEPA notifies the Permittee of a deficiency with any revision to the Episode Action Plan, the Permittee shall be required to revise and resubmit the Episode Action Plan within 30 days of receipt of notification to address the deficiency pursuant to Section 39.5(7)(a) of the Act.
- iv. The Episode Action Plan, as submitted by the Permittee on November 7, 2013, is incorporated herein by reference. The document constitutes the formal Episode Action Plan required by 35 IAC 244.142, addressing the actions that will be implemented to reduce SO₂, PM₁₀, NO₂, CO and VOM emissions from various emissions units in the event of a yellow alert, red alert or emergency issued under 35 IAC 244.161 through 244.165.
- v. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a copy of the Episode Action Plan, any amendments or revisions to the Episode Action Plan (as required by Condition 3.2(c)), and the Permittee shall also keep a record of activities completed according to the Episode Action Plan.

d. Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the Permittee shall submit a compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or submit a certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan, as part of the annual compliance certification required by Condition 2.6(a). This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

3. Title I Requirements

a. i. Volatile Organic Material Requirements (VOM)

- A. Pursuant to Section 39.5(7)(a) of the Act, and Construction Permit # 07010014, the permit is issued based on the emission units listed in Conditions 4.2.1, and 4.3.1 not being subject to 35 IAC 218 Subpart RR. VOM emissions from the source shall not exceed 4.0 ton/monthly and 24.0 ton/year. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). [T1R]

ii. Compliance Method (Operational and Production Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the VOM emission for each group of emission units listed in Condition 4.2.1 and 4.3.1. (ton/month and ton/year).

4. Synthetic Minor Limits

As of the date of issuance of this permit, there are no source-wide synthetic minor limits that need to be included in this Condition.

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5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows:
 - I. Requirements in Conditions 3.1(a)(i), 3.1(b), 3.1(c), 3.1(d), and 3.1(e).
 - II. Requirements in Conditions 3.2(a), 3.2(b), 3.2(c), and 3.2(d)
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.
- iv. All deviation reports required in this Permit shall be identified, summarized, and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).

b. Semiannual Reporting

- i. Pursuant to Section 39.5(7)(f)(i) of the Act, the Permittee shall submit Semiannual Monitoring Reports to the IEPA, Air Compliance Section, summarizing required monitoring as part of the Compliance Methods in this Permit submitted every six months as follows, unless more frequent reporting is required in other parts of this permit.

<u>Monitoring Period</u>	<u>Report Due Date</u>
January through June	July 31
July through December	January 31
- ii. The Semiannual Monitoring Report must be certified by a Responsible Official consistent with Condition 2.6(b).

c. Annual Emissions Reporting

Pursuant to 35 IAC Part 254, the Source shall submit an Annual Emission Report to the Air Quality Planning Section, due by May 1 of the year following the calendar year in which the emissions took place. All records and calculations upon which the verified and reported data are based must be retained by the source.

Section 4 - Emission Unit Requirements

4.1 Natural Gas Fired Boilers

1. Emission Units and Operations

Emission Units	Pollutants Being Regulated	Original Construction Date	Modification/ Reconstruction Date	Air Pollution Control Devices or Measures	Monitoring Devices
Two 105 mmBtu/hr Natural gas-fired Boiler with backup distillate fuel oil #2 maximum heat input (B#1 and B#2)	PM, SO ₂ , CO, NO _x	Prior to Jun 1973	None	None	None
125 mmBtu/hr Natural gas-fired Boiler with backup distillate fuel oil #2 maximum heat input fired (B#3)	PM, SO ₂ , CO, NO _x	Prior to Jun 1973	None	None	None

2. Applicable Requirements

For the emission unit in Condition 4.1.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act. In addition, the boilers shall comply with the applicable requirements in Section 8.2.

a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each boiler in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the boiler, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.

- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.206, the emissions of particulate matter (PM) into the atmosphere in any one-hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/mmBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively.

ii. Compliance Method (PM Requirements)

Testing

- A. Pursuant to Section 39.5(7)(d) of the Act, the boilers shall be tested by USEPA Method 5 upon operation of 48 hours in this mode in a calendar year. Testing shall occur within 90 days after the 48 hours per calendar year threshold has been exceeded as defined in 40 CFR 63.11237.
- B. Pursuant to Section 39.5(7)(a), the Permittee shall also comply with the requirements in Section 7.1.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of PM emissions from the boilers when fired with distillate oil including supporting calculations (pounds/mmBtu).

c. i. Sulfur Dioxide Requirements (SO₂)

- A. Pursuant to 35 IAC 214.161(b), no person shall cause or allow the emission of sulfur dioxide (SO₂) into the atmosphere in any one-hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively to exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/mmBtu).
- B. Pursuant to Section 39.5(7)(b) of the Act, the sulfur content of the distillate fuel oil shall not exceed 0.28 weight percent.

ii. Compliance Method (SO₂ Requirements)

Recordkeeping

- A. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of SO₂ emissions from the boilers when fired with distillate fuel oil including supporting calculations (pounds/mmBtu).
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the sulfur content of the distillate fuel oil (weight percent).

d. i. Carbon Monoxide Requirements (CO)

- A. Pursuant to 35 IAC 216.121, the emissions of carbon monoxide (CO) into the atmosphere from any fuel combustion emission unit with actual heat input greater than 2.9 MW (10 mmBtu/hr) shall not exceed 200 ppm, corrected to 50 percent excess air.

ii. Compliance Method (CO Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(d), the Permittee shall conduct a biennial performance tune-up. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The Permittee shall conduct a tune-up as specified in the following paragraphs I to VI.
- I. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the owner or operator may delay the burner inspection until the next scheduled unit shutdown, but the owner or operator must inspect each burner at least once every 36 months).
- II. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- III. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly.
- IV. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available.
- V. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made).
- VI. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of inspections and tune-ups performed.
- C. Pursuant to Section 39.5(7)(a), the Permittee shall keep the records of monthly and annual CO emissions (pounds/hour, ton/month, and ton/year), including supporting calculations.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records onsite of tune-ups containing the following information:
- I. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of each boiler.
- II. A description of any corrective actions taken as a part of the tune-up of each boiler.
- III. The type and amount of fuel used over the 12 months prior to the biennial tune-up of each boiler.
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records of each inspection performed along with a maintenance, repair log and tune-ups performed. These records shall include, at a minimum:

- I. date and time inspections were performed,
- II. name(s) of inspection personnel,
- III. identification of equipment being inspected,
- IV. findings of the inspections,
- V. operation and maintenance procedures,
- VI. description of all maintenance and repair activities performed including if the activity resulted in a modification or reconstruction of the piece of equipment.

e. i. **Operational and Production Requirements**

- A. Pursuant to Section 39.5(7)(a) of the Act, distillate oil with a sulfur content of no more than 0.3 weight percent and the pipeline quality natural gas shall be only the fuels used in the boiler.
- B. Pursuant to Section 39.5(7)(a) of the Act, each boiler is allowed to operate on liquid fuel up to 48 hours for periodic testing, periods of gas curtailment and gas supply interruptions, during a calendar year.

ii. **Compliance Method (Operational and Production Requirements)**

Recordkeeping Requirements

- A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the type of fuel fired in the boiler and sulfur content.
- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall maintain records of the reason for distillate oil use and hours of operation when fired with distillate fuel oil (hours/month and hours/year).

3. Non-Applicability Determinations
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- a. The boilers are not subject to the New Source Performance Standards (NSPS) Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Da, because the boilers are existing boilers with an actual heat input less than 73.2 MW (250 mmBtu/hr), pursuant to 40 CFR 60.40Da(a).
- b. The boilers are not subject to the New Source Performance Standards (NSPS) Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Db, because the boilers are not modified, or reconstructed after June 19, 1984, pursuant to 40 CFR 60.40Db(a).
- c. The boilers are not subject to the New Source Performance Standards (NSPS) Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, 40 CFR Part 60, Subpart Dc, because the boilers are not modified, or reconstructed after Jun 9, 1989, pursuant to 40 CFR 60.40Dc(a).
- d. The boilers are not subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Source, 40 CFR Part 63 Subparts A and JJJJJJ, because the boilers are gas-fired boilers as defined in 40 CFR 63.11237 pursuant to 40 CFR 63.11195(e).
- e. The boilers are not subject to the National Emission Standards for Hazardous Air Pollution (NESHAP) for National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63 Subpart DDDDD, because the boilers are not located at a major source HAP emissions.

- f. The boilers are not subject to 35 IAC 212.206 because the boilers use natural gas exclusively.
- g. The boilers are not subject to 35 IAC 214.161 SO₂ Emissions in Existing Liquid or Mixed Fuel Combustion Emission Sources because the boilers use natural gas exclusively.
- h. Pursuant to 35 IAC 218.303, Organic Material Emission Standards And Limitations For The Chicago Area because the boilers are fuel combustion emission units, the boilers are not subject to 35 IAC Part 218, Subpart G.
- i. Pursuant to 35 IAC 217.141, NO_x Emissions in Existing Emission Units in Major Metropolitan Areas the existing boilers with an actual heat input less than 73.2 MW (250 mmBtu/hr) are not subject to 35 IAC 217.141(a) through (c).
- j. The boilers are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because it does not use an add-on control device(s) to achieve compliance with the limitations for any regulated air pollutant.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - Requirements in Conditions 4.2.2(a)(i), (b)(i), through (g)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Reports required by in Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.2 Soap and Refined Glycerine Production Lines

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Pretreatment, Hydrolysis, Hydrogenation, Distillation, and Fractionation of fatty Acids					
Deaerators Dehydrators Fatty Acid Stills Sweetwater Flash Tanks Fractionator Hydrogenator	PM, VOM ₂	Prior to Jun 1973 (C-Train)-1986	1979	Afterburner	None
Glycerine Concentrations and Refining					
Concentrator	PM, VOM ₂	Prior to Jun 1973	1979	Afterburner	None
Sweetwater Treatment	PM, VOM	Prior to Jun 1973	N/A	Venturi scrubber	None
Tanks	PM, VOM	Prior to Jun 1973	N/A	Venturi scrubber	None
Glycerine Evaporation System Main Glycerine Still Rectifying Column Pitch Column	PM, VOM ₂	1992	1979	Afterburner	None
Carbon Bag Dumping Station	PM, VOM	1987	N/A	Filter	None
Carbon Bleaching Tanks	PM, VOM ₂	Prior to April 1972	N/A	Filters	None
Glycerine Desiccator	PM, VOM ₂	Prior to Jun 1972	1979	Afterburner	None
Soap Saponification and Drying					
Soap Dryers (1-5)	PM, VOM, SO ₂	Prior to Jun 1973	N/A	Mulicyclones	None
Pneumatic Conveying System					
Pneumatic Conveying System	PM, VOM	1987	N/A	Baghouses	None
Perfume and Slurry Blending and Distribution					
Process Tank	PM, VOM	1987	N/A	Baghouses	None

2. Applicable Requirements

For the emission units in Condition 4.2.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the Soap and Refined Glycerine Production Lines, maintenance and repair, and/or adjustment of fuel usage.

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If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Permit Section 7.2(a) and (b)).
- B. Pursuant to 35 IAC 212.322(a), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). (See also Permit Section 7.2(a) and (b)).

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform quarterly inspections of each control device used.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall change the filters used at least semiannually.

Recordkeeping

- C. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep monthly and annual actual emissions of PM, with supporting calculations, along with calculations including hours of operation along with calculations of allowable emissions established by 35 IAC 212.321(a).
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the control devices inspection, maintenance and replacement log.

c. i. **Sulfur Dioxide Requirements (SO₂)**

A. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to excess 2000 ppm.

ii. **Compliance Method (SO₂ Requirements)**

Monitoring

A. For sufficient periodic monitoring see Condition 4.2.2(e)(i) and (e)(ii).

d. i. **Volatile Organic Material Requirements (VOM)**

A. Pursuant to 35 IAC 218.301, No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 IAC 218.301 shall apply only to photochemically reactive material. (See Permit Condition 4.2.1** for emission units not controlled by afterburner)

B. Pursuant to 35 IAC 218.302, emissions of organic material in excess of those permitted by 35 IAC 218.301 are allowable if an afterburner operates at the levels equal to either 10 ppm equivalent methane (molecular weight 16) or less, or to convert 85 percent of the hydrocarbons to carbon dioxide and water; (see Permit Condition 4.2.1 for emission units controlled by afterburner).

ii. **Compliance Method (VOM Requirements)**

Monitoring

A. For sufficient periodic monitoring see Condition 4.2.2(f)(i) and (f)(ii).

Testing

B. Pursuant to 39.5(7)(a) of the Act, the Permittee shall test VOM emissions from the afterburner within 9 months of the effective date of this permit and every five years thereafter by using Method 25 or 25A of 40 CFR 60 Appendix A and comply with all the applicable requirements in Section 7.1 of this permit.

e. i. **Operational and Production Requirements**

A. Pursuant to Section 39.5(7)(a) of the Act, pipeline quality natural gas shall be the only fuel fired in the afterburner or keep on file a document from the gas provider certifying the sulfur content in the supplied natural gas does not exceed 2000 ppm.

ii. **Compliance Method (Operational and Production Requirements)**

Recordkeeping

A. Pursuant to Section 39.5(7)(b), the Permittee shall maintain records of the type of fuel fired in the Dryers.

f. i. **Work Practice and Control Requirements**

A. Pursuant to Section 39.5(7)(a) of the Act, the afterburner shall:

- I. be in operation at all times and collecting all the vapor gases from glycerine concentration and hydrolysis, hydrogenation, distillation, and fractionation of fatty acids.
- II. not be seasonally shut down as would be allowed in 35 IAC 218.107.
- III. an afterburner combustion chamber shall be preheated to the manufacturer's recommended temperature but not lower than 1400°C when operating, and this temperature shall be maintained all time during operation of the afterburner.

ii. Compliance Method (Work Practice Requirements)

Monitoring

- A. Pursuant to Section 37.5(7)(a) of the Act, the Permittee must install, calibrate, operate and maintain, in accordance with manufacturer's specifications, a continuous recorder on the temperature monitoring device.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform quarterly inspections of the afterburner. As part of such inspections, all needed maintenance shall be conducted and necessary repairs performed.

Recordkeeping

- C. Pursuant to Section 37.5(7)(b) of the Act, the afterburner shall be equipped with a continuous temperature indicator and strip chart recorder or disk storage. Such as a strip chart, recorder or computer, having an accuracy of ± 1 percent of the temperature measured in degrees Celsius or $\pm 0.5^\circ\text{C}$, whichever is greater.
- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep a maintenance log for the capture system and afterburner detailing all routine and non-routine maintenance performed, inspections and including dates and duration of any outages.

3. Non-Applicability Determinations
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- a. The soap and refined glycerine production line is not subject to the requirements of 35 IAC Part 218 Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes, because of the total PTE VOM emissions shall not exceed 25 ton/year. See Permit Condition 3.3.
- b. The soap and refined glycerine production line is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM and VOM, because the soap and refined glycerine production line does not have potential PM and VOM pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

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Permit No.: 96030154

Date Received: 04/06/2007
Date Issued: TBD

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.2.2(a)(i), 4.2.2(b)(i), 4.2.2(c)(i), 4.2.2(d)(i), 4.2.2(e)(i), and 4.2.2(f)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.3 Antiperspirant/Deodorant (APDO) Products Manufacturing Lines

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Antiperspirant /Deodorant (APDO) Line 11					
Five processes tanks (CG-TK-15 to 18 and 11-TK-01) and associated packaging equipment (activities including filling, cooling, coding (ink jet) labeling, wrapping, and packing of containers.	PM, VOM	04/12/2007	N/A	None	None
Antiperspirant /Deodorant (APDO) Line 12					
Six uncontrolled processes tanks (12-TK-1 to 4 and Ap-TK-10 and 11) and Five process tanks (12-TK-12 and GD-TK-20 to 23) with cartridge type dust collector (GD-DC-01), dry powder handling station (AP-PH-01) with an integral hood and dust collector, and associated packing equipment	PM, VOM	01/12/2007	N/A	Dust Collector	None
Additional Raw Material Storage					
Seven storage tanks with nitrogen blanket (BE-TK-02, SIL1-TK-03, SIL2-TK-04, SIL3-TK-05, ETH-TK-06, PLG-TK-07, and GB-TK-08) of varying sizes of liquid raw materials	PM, VOM	04/12/2007	N/A	None	None

2. Applicable Requirements

For the emission units in Condition 4.3.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the Antiperspirant/Deodorant (APDO) Products Manufacturing Lines, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

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Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection 35 IAC 212.321(b) or (c).
- B. Pursuant to Construction Permit #07010014, PM emissions from the Antiperspirant/Deodorant (APDO) Products Manufacturing Lines shall not exceed nominal emission rates of 0.10 pounds/hour and 0.44 tons/year. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform quarterly inspections of each control device used.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall change the filters used at least semiannually.
- C. Pursuant to Construction Permit #07010014, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- D. Pursuant to Section 39.5(7)(a) of the Act, compliance with hourly limits shall be determined on the 30-day monthly rolling average.

Recordkeeping

- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep monthly and annual actual emissions of PM, with supporting calculations, along with calculations including hours of operation along with calculations of allowable emissions established by 35 IAC 212.321(a).
- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the control devices inspection, maintenance and replacement log.
- G. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of monthly and annual PM emissions (lb/hr and ton/year), including supporting calculations.

c. i. **Volatile Organic Material Requirements (VOM)**

- A. Pursuant to 35 IAC 218.301, No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of this 35 IAC 218.301 shall apply only to photochemically reactive material.
- B. Pursuant to Construction Permit #07010014, VOM emissions from: [T1]
 - I. the process tanks CG-TK-15, 16 and 18 shall not exceed 0.7 tons/month and 6.9 tons/year; and
 - II. raw material storage shall not exceed 0.10 pounds/hour and 0.44 tons/year.

ii. **Compliance Method (VOM Requirements)**

Monitoring

- A. Pursuant to Construction Permit #07010014, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a) of the Act, compliance with hourly limits shall be determined on the 30-day monthly rolling average.

Testing

- C. Pursuant to 39.5(7)(a) of the Act, the Permittee shall test VOM emissions from the Antiperspirant/Deodorant products manufacturing lines within 9 months of the effective date of this permit and every five years thereafter by using Method 25 or 25A of 40 CFR 60 Appendix A and comply with all the applicable requirements in Section 7.1 of this permit.

Recordkeeping

- D. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep monthly and annual actual emissions of VOM, with supporting calculations, along with calculations including hours of operation along with calculations of allowable emissions established by 35 IAC 212.321(a).
- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of monthly and annual VOM emissions (lb/hr and ton/year), including supporting calculations.
- F. Pursuant to Construction Permit #07010014, the Permittee shall keep the records of monthly and annual VOM emissions from tanks CG-TK-15, 16 and 18 (lb/month and tons/year, with supporting calculations).

d. i. **Operational and Production Requirements**

- A. Pursuant to Construction Permit #07010014, tanks CG-TK-15, 16, and 18 shall not produce more than 3,300 batches of products per year, total. [T1]

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to Construction Permit #07010014, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- B. Pursuant to Section 39.5(7)(a) of the Act, compliance with hourly limits shall be determined on the 30-day monthly rolling average.

Recordkeeping

- C. Pursuant to Construction Permit #07010014 and Section 39.5(7)(b) of the Act, the Permittee shall keep the following:
 - I. operating and maintenance procedures recommended by the manufacturer for each dust collector.
 - II. operating and maintenance logs for each unit equipped with dust collectors, that, at the minimum, identify any handling of dry powder material without operating associated dust control equipment and maintenance and repair activities for the dust collectors.
 - III. production by the process tanks CG-TK-15, 16 and 18 (batches/month and batches/year, by type of product).

3. Non-Applicability Determinations

- a. The Antiperspirant/Deodorant (APDO) Products Manufacturing Lines are not subject to the requirements of 35 IAC Part 218 Subpart RR, Miscellaneous Organic Chemical Manufacturing Processes, because of the total PTE VOM emissions shall not exceed 25 ton/year. See Permit Condition 3.3
- b. The Antiperspirant/Deodorant (APDO) Products Manufacturing Lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM, because the soap and refined glycerine production line does not have potential PM and VOM pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
 - I. Requirements in Conditions 4.3.2(a)(i), 4.3.2(b)(i), 4.3.2(c)(i), and 4.3.2(d)(i)

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4.3 - Antiperspirant/Deodorant (APDO) Products Manufacturing Lines

- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
 - A. Date and time of the deviation.
 - B. Emission unit(s) and/or operation involved.
 - C. The duration of the event.
 - D. Probable cause of the deviation.
 - E. Corrective actions or preventative measures taken.

4.4 Talc Storage Silo and a Scale Hopper

1. Emission Units and Operations

<i>Emission Units</i>	<i>Pollutants Being Regulated</i>	<i>Original Construction Date</i>	<i>Modification/ Reconstruction Date</i>	<i>Air Pollution Control Devices or Measures</i>	<i>Monitoring Devices</i>
Talc Storage Silo and a Scale Hopper	PM	08/24/2006	N/A	filters	None

2. Applicable Requirements

For the emission units in Condition 4.4.1 above, the Permittee shall comply with the following applicable requirements pursuant to Sections 39.5(7)(a), 39.5(7)(b), and 39.5(7)(d) of the Act.

a. i. Opacity Requirements

- A. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit.

ii. Compliance Method (Opacity Requirements)

Monitoring

- A. Pursuant to Sections 39.5(7)(b) and (d) of the Act, at a minimum, the Permittee shall perform observations for opacity on each emission unit in accordance with Method 22 for visible emissions at least once every calendar year. If visible emissions are observed, the Permittee shall take corrective action within 4 hours of such observation. Corrective action may include, but is not limited to, shut down of the Talc Storage Silo and a Scale Hopper, maintenance and repair, and/or adjustment of fuel usage. If corrective action was taken, the Permittee shall perform a follow up observation for visible emissions in accordance with Method 22. If visible emissions continue, then measurements of opacity in accordance with Method 9 shall be conducted within 7 days in accordance with Condition 2.4.

Recordkeeping

- B. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep records for each observation for opacity conducted. These records shall include, at a minimum: date and time the observation was performed, name(s) of observing personnel, identification of which equipment was observed, whether or not the equipment was running properly, the findings of the observation including the presence of any visible emissions, and a description of any corrective action taken including if the corrective action took place within 4 hours of the observation.
- C. Pursuant to Section 39.5(7)(b) of the Act, if required, the Permittee shall keep records for all opacity measurements made in accordance with USEPA Method 9.

b. i. Particulate Matter Requirements (PM)

- A. Pursuant to 35 IAC 212.321, no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection 35 IAC 212.321(b) or (c).

- B. Pursuant to Construction Permit #06060039, PM emissions from the Talc Storage Silo and a Scale Hopper shall not exceed nominal emission rates of 1 pounds/hour and 1 tons/year. [T1]

ii. Compliance Method (PM Requirements)

Monitoring

- A. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall perform quarterly inspections of each control device used.
- B. Pursuant to Section 39.5(7)(a) of the Act, the Permittee shall change the filters used at least semiannually.
- C. Pursuant to Construction Permit # 06060039, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- D. Pursuant to Section 39.5(7)(a) of the Act, compliance with hourly limits shall be determined on the 30-day monthly rolling average.

Recordkeeping

- E. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep monthly and annual actual emissions of PM, with supporting calculations, along with calculations including hours of operation along with calculations of allowable emissions established by 35 IAC 212.321(a).
- F. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the control devices inspection, maintenance and replacement log.
- G. Pursuant to Section 39.5(7)(b) of the Act, the Permittee shall keep the records of monthly and annual PM emissions (lb/hr and ton/year), including supporting calculations.

c. i. Operational and Production Requirements

- A. Pursuant to Construction Permit #06060039, the maximum talc throughput of the Talc Storage Silo and a Scale Hopper shall not exceed 7,500 tons/year. [T1]
- B. Pursuant to Construction Permit #06060039, the transfer of the talc to the storage silo and to the scale hopper shall not occur unless the associated fabric filters is in proper operating condition and operating.

ii. Compliance Method (Operational and Production Requirements)

Monitoring

- A. Pursuant to Construction Permit #06060039, compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

Recordkeeping

- B. Pursuant to Construction Permit #06060039, the Permittee shall keep the following records:
 - I. operating and maintenance procedures recommended by the manufacturer for the Talc Storage Silo and a Scale Hopper.

II. operating and maintenance logs for each unit equipped with dust collectors, that, at the minimum, identify any transfer of the talc to the storage silo or to the scale hopper that occurs in violation of condition 4.4.2(c).

III. amount of talc received (tons /month and tons/year).

3. Non-Applicability Determinations

- a. The Talc Storage Silo and a Scale Hopper are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources for PM, because the soap and refined glycerine production line have potential PM and VOM pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

4. Other Requirements

As of the date of issuance of this permit, there are no other requirements that need to be included in this Condition.

5. Reporting Requirements

The Permittee shall submit the following information pursuant to Section 39.5(7)(f) of the Act. Addresses are included in Attachment 3.

a. Prompt Reporting

- i. A. Pursuant to Section 39.5(7)(f)(ii) of the Act, the Permittee shall promptly notify the IEPA, Air Compliance Section, within 30 days of deviations from applicable requirements as follows unless a different period is specified by a particular permit provision, i.e., NSPS or NESHAP requirement:
- I. Requirements in Conditions 4.4.2(a)(i), 4.4.2(b)(i), 4.4.2(c)(i), and 4.4.2(d)(i).
- B. All such deviations shall be summarized and reported as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- ii. The Permittee shall notify the IEPA, Air Compliance Section, of all other deviations as part of the Semiannual Monitoring Report required by Condition 3.5(b).
- iii. The deviation reports shall contain at a minimum the following information:
- A. Date and time of the deviation.
- B. Emission unit(s) and/or operation involved.
- C. The duration of the event.
- D. Probable cause of the deviation.
- E. Corrective actions or preventative measures taken.

Section 5 - Additional Title I Requirements

1. Construction Permits

As of the date of issuance of this permit, there are no Title I requirements that need to be separately addressed in this Section.

Section 6 - Insignificant Activities Requirements

1. Insignificant Activities Subject to Specific Regulations

This condition is reserved for insignificant activities, as defined in 35 IAC 201.210 and 201.211, which are subject to specific standards promulgated pursuant Sections 111, 112, 165, or 173 of the Clean Air Act, see Sections 9.1(d) and 39.5(6)(a) of the Act. As of the date of issuance of this permit, there are no such insignificant activities present at the source.

2. Insignificant Activities in 35 IAC 201.210(a)

In addition to any insignificant activities identified in Condition 6.1, the following additional activities at the source constitute insignificant activities pursuant to 35 IAC 201.210 and 201.211:

<i>Insignificant Activity</i>	<i>Number of Units</i>	<i>Insignificant Activity Category</i>
Process Tanks	29	35 IAC 201.210(a)(2) or (a)(3)
Decanters	3	35 IAC 201.210(a)(2) or (a)(3)
Dilution Tank	4	35 IAC 201.210(a)(2) or (a)(3)
Hot Weells	3	35 IAC 201.210(a)(2) or (a)(3)
Feed Water Tank	1	35 IAC 201.210(a)(2) or (a)(3)
Evaporator Feed Tanks	1	35 IAC 201.210(a)(2) or (a)(3)
Soap Saponification	8	35 IAC 201.210(a)(2) or (a)(3)
Utilities	1	35 IAC 201.210(a)(2) or (a)(3)
Maintenance Paint Booth	1	35 IAC 201.210(a)(2) or (a)(3)
Equipment used to fill drums, pails, or other containers (excluding aerosol cans) as further detailed in 35 IAC 2101.210(a)(8).	1	35 IAC 201.210(a)(8)
Storage tanks < 10,000 gallon with annual throughput < 100,000 gallon (not storing gasoline or any material listed as a HAP).	1	35 IAC 201.210(a)(10)
Any size storage tanks containing exclusively soaps, detergents, surfactants, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions where an organic solvent has not been mixed.	96	35 IAC 201.210(a)(17)
Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions.	12	35 IAC 201.210(a)(18)

3. Insignificant Activities in 35 IAC 201.210(b)

Pursuant to 35 IAC 201.210, the source has identified insignificant activities as listed in 35 IAC 201.210(b)(1) through (28) as being present at the source. The source is not required to individually list the activities.

4. Applicable Requirements

Insignificant activities in Conditions 6.1 and 6.2 are subject to the following general regulatory limits notwithstanding status as insignificant activities. The Permittee shall comply with the following requirements, as applicable:

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- a. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 IAC 212.122, except as provided in 35 IAC 212.123(b).
- b. Pursuant to 35 IAC 212.321 or 212.322 (see Conditions 7.2(a) and (b)), no person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceed the allowable emission rates specified 35 IAC 212.321 or 212.322 and 35 IAC Part 266.
- c. Pursuant to 35 IAC 214.301, no person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2,000 ppm, except as provided in 35 IAC Part 214.
- d. Pursuant to 35 IAC 218.301, no person shall cause or allow the discharge of more than 8 lbs/hr of organic material into the atmosphere from any emission source, except as provided in 35 IAC 218.302, 218.303, 218.304 and the following exception: If no odor nuisance exists the limitation of 35 IAC 215 Subpart K shall apply only to photochemically reactive material.
- e. Pursuant to 35 IAC 218.122(b), no person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 250 gal, unless such tank is equipped with a permanent submerged loading pipe, submerged fill, or an equivalent device approved by the IEPA according to 35 IAC Part 201 or unless such tank is a pressure tank as described in 35 IAC 215.121(a) or is fitted with a recovery system as described in 35 IAC 215.121(b)(2). Exception as provided in 35 IAC 218.122(c): If no odor nuisance exists the limitations of 35 IAC 215.122 shall only apply to the loading of volatile organic liquid with a vapor pressure of 2.5 psia or greater at 70°F.
- f. Pursuant to 35 IAC 218.182, for each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182, except as provided in 35 IAC 218.181.

5. Compliance Method

Pursuant to Section 39.5(7)(b) of the Act, the source shall maintain records of the following items for the insignificant activities in Conditions 6.1 and 6.2:

- a. List of all insignificant activities, including insignificant activities added as specified in Condition 6.6, the categories the insignificant activities fall under, and supporting calculations as needed for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).
- b. Potential to emit emission calculations before any air pollution control device for any insignificant activities listed in 35 IAC 201.210(a)(1) through (3).

6. Notification Requirements for Insignificant Activities

The source shall notify the IEPA accordingly to the addition of insignificant activities:

a. Notification 7 Days in Advance

- i. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(1) and 201.211 and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3. The notification shall include the following pursuant to 35 IAC 201.211(b):

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- A. A description of the emission unit including the function and expected operating schedule of the unit.
 - B. A description of any air pollution control equipment or control measures associated with the emission unit.
 - C. The emissions of regulated air pollutants in lb/hr and ton/yr.
 - D. The means by which emissions were determined or estimated.
 - E. The estimated number of such emission units at the source.
 - F. Other information upon which the applicant relies to support treatment of such emission unit as an insignificant activity.
- ii. Pursuant to 35 IAC 201.212(b), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a)(2) through 201.210(a)(18) and is not currently identified in Conditions 6.1 or 6.2, a notification to the IEPA Permit Section 7 days in advance of the addition of the insignificant activity is required. Addresses are included in Attachment 3.
 - iii. Pursuant to Sections 39.5(12)(a)(i)(b) and 39.5(12)(b)(iii) of the Act, the permit shield described in Section 39.5(7)(j) of the Act (see Condition 2.7) shall not apply to any addition of an insignificant activity noted above.

b. Notification Required at Renewal

Pursuant to 35 IAC 201.212(a) and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(a) and is currently identified in Conditions 6.1 or 6.2, a notification is not required until the renewal of this permit.

c. Notification Not Required

Pursuant to 35 IAC 201.212I and 35 IAC 201.146(kkk), for the addition of an insignificant activity that would be categorized under 35 IAC 201.210(b) as describe in Condition 6.3, a notification is not required.

Section 7 - Other Requirements

1. Testing

- a. Pursuant to Section 39.5(7)(a) of the Act, a written test protocol shall be submitted at least sixty (60) days prior to the actual date of testing, unless it is required otherwise in applicable state or federal statutes. The IEPA may at the discretion of the Compliance Section Manager (or designee) accept protocol less than 60 days prior to testing provided it does not interfere with the IEPA's ability to review and comment on the protocol and does not deviate from the applicable state or federal statutes. The protocol shall be submitted to the IEPA, Compliance Section and IEPA, Stack Test Specialist for its review. Addresses are included in Attachment 3. This protocol shall describe the specific procedures for testing, including as a minimum:
 - i. The name and identification of the emission unit(s) being tested.
 - ii. Purpose of the test, i.e., permit condition requirement, IEPA or USEPA requesting test.
 - iii. The person(s) who will be performing sampling and analysis and their experience with similar tests.
 - iv. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the emission unit and any control equipment will be determined.
 - v. The specific determinations of emissions and operation which are intended to be made, including sampling and monitoring locations.
 - vi. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods. Include if emission tests averaging of 35 IAC 283 will be used.
 - vii. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - viii. Any proposed use of an alternative test method, with detailed justification. This shall be included as a waiver of the test procedures. If a waiver has already been obtained by the IEPA or USEPA, then the waiver shall be submitted.
 - ix. Sampling of materials, QA/QC procedures, inspections, etc.
- b. The IEPA, Compliance Section shall be notified prior to these tests to enable the IEPA to observe these tests pursuant to Section 39.7(a) of the Act as follows:
 - i. Notification of the expected date of testing shall be submitted in writing a minimum of thirty (30) days prior to the expected test date, unless it is required otherwise in applicable state or federal statutes.
 - ii. Notification of the actual date and expected time of testing shall be submitted in writing a minimum of five (5) working days prior to the actual date of the test. The IEPA may at its discretion of the Compliance Section Manager (or designee) accept notifications with shorter advance notice provided such notifications will not interfere with the IEPA's ability to observe testing.
- c. Copies of the Final Report(s) for these tests shall be submitted to the IEPA, Compliance Section within fourteen (14) days after the test results are compiled and finalized but

no later than ninety (90) days after completion of the test, unless it is required otherwise in applicable state or federal statutes or the IEPA may at the discretion of the Compliance Section Manager (or designee) an alternative date is agreed upon in advance pursuant to Section 39.7(a) of the Act. The Final Report shall include as a minimum:

- i. General information including emission unit(s) tested.
 - ii. A summary of results.
 - iii. Discussion of conditions during each test run (malfunction/breakdown, startup/shutdown, abnormal processing, etc.).
 - iv. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - v. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g. fuel or raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - vi. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vii. An explanation of any discrepancies among individual tests or anomalous data.
 - viii. Results of the sampling of materials, QA/QC procedures, inspections, etc.
 - ix. Discussion of whether protocol was followed and description of any changes to the protocol if any occurred.
 - x. Demonstration of compliance showing whether test results are in compliance with applicable state or federal statutes.
- d. Copies of all test reports and other test related documentation shall be kept on site as required by Condition 2.5(b) pursuant to Section 39.5(7)(e)(ii) of the Act.

2. PM Process Weight Rate Requirements

a. New Process Emission Units - 35 IAC 212.321

New Process Emission Units For Which Construction or Modification Commenced On or After April 14, 1972. [35 IAC 212.321]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any new process emission unit which, either alone or in combination with the emission of PM from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321I. See Condition 7.2(a)(iii) below. [35 IAC 212.321(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.321I shall be determined by using the equation: [35 IAC 212.321(b)]

$$E = A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

A. Process weight rates of less than 450 T/hr:

A = 2.54
B = 0.53

B. Process weight rates greater than or equal to 450 T/hr:

A = 24.8
B = 0.16

iii. Limits for New Process Emission Units [35 IAC 212.321I]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	14.00
0.10	0.77	30.00	15.60
0.20	1.10	35.00	17.00
0.30	1.35	40.00	18.20
0.40	1.58	45.00	19.20
0.50	1.75	50.00	20.50
0.75	2.40	100.00	29.50
1.00	2.60	150.00	37.00
2.00	3.70	200.00	43.00
3.00	4.60	250.00	48.50
4.00	5.35	300.00	53.00
5.00	6.00	350.00	58.00
10.00	8.70	400.00	62.00
15.00	10.80	450.00	66.00
20.00	12.50	500.00	67.00

b. Existing Process Emission Units - 35 IAC 212.322

Existing Process Emission Units For Which Construction or Modification Commenced Prior to April 14, 1972. [35 IAC 212.322]

- i. No person shall cause or allow the emission of PM into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of PM from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.322I). See Condition 7.2(b)(iii) below. [35 IAC 212.322(a)]
- ii. Interpolated and extrapolated values of the data in 35 IAC 212.322I shall be determined by using the equation: [35 IAC 212.322(b)]

$$E = C + A(P)^B$$

Where:

P = Process weight rate (T/hr)
E = Allowable emission rate (lbs/hr)

- A. Process weight rates of less than 450 T/hr:

A = 4.10
B = 0.67
C = 0

- B. Process weight rates greater than or equal to 450 T/hr:

A = 55.0
B = 0.11
C = -40.0

- iii. Limits for Existing Process Emission Units [35 IAC 212.322I]:

<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>	<u>P</u> <u>(T/hr)</u>	<u>E</u> <u>(lbs/hr)</u>
0.05	0.55	25.00	35.40
0.10	0.87	30.00	40.00
0.2	1.40	35.00	41.30
0.30	1.83	40.00	42.50
0.40	2.22	45.00	43.60
0.50	2.58	50.00	44.60
0.75	3.38	100.00	51.20
1.00	4.10	150.00	55.40
2.00	6.52	200.00	58.60
3.00	8.56	250.00	61.00
4.00	10.40	300.00	63.10
5.00	12.00	350.00	64.90
10.00	19.20	400.00	66.20
15.00	25.20	450.00	67.70
20.00	30.50	500.00	69.00

3. Emissions Reduction Market System (ERMS) Requirements

- a. Pursuant to 35 IAC Part 205, ERMS seasonal emissions of VOM during the seasonal allotment period from May 1 through September 30 shall not exceed 10 tons/year
- b. Pursuant to 35 IAC 205, the Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:
 - i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as specified in Sections 3 and 4 of this permit, as appropriate, to determine actual VOM emissions during the seasonal allotment period.
 - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures specified in Sections 3 and 4 of this permit.
 - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
- c. Pursuant to 35 IAC Section 205.150(c), in the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 IAC Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in its CAAPP permit.

Section 8 - State Only Requirements

1. Permitted Emissions for Fees

The annual emissions from the source for purposes of "Duties to Pay Fees" of Condition 2.3(e), not considering insignificant activities as addressed by Section 6, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. The Permittee shall maintain records with supporting calculations of how the annual emissions for fee purposes were calculated. This Condition is set for the purpose of establishing fees and is not federally enforceable. See Section 39.5(18) of the Act.

Pollutant	Tons/Year
Volatile Organic Material (VOM)	26.99
Sulfur Dioxide (SO ₂)	8.0
Particulate Matter (PM)	66.14
Nitrogen Oxides (NO _x)	405.00
HAP, not included in VOM or PM (HAP)	----
Total	506.13

2. NO_x RACT Requirements

a. i. Natural Gas Fired Boilers (See also Section 4.1)

- A. Pursuant to 35 IAC 217.164, no person shall cause or allow emissions of NO_x into the atmosphere from any industrial boiler to exceed the following limitations, on and after January 1, 2015. If after the issuance of this permit, the Permittee elects to accept Federally enforceable limits below the applicability criteria in 35 IAC 217.150(a)(1)(B) in order to avoid the requirements below, a permit modification application must be submitted to the Illinois EPA Permit Section by October 1, 2014.
- B. Pursuant to 35 IAC 217.164, Subpart E: Industrial Boilers, the Permittee shall not cause or allow emissions to exceed the following:

Fuel	Emission Unit Type and Rated Heat Input Capacity (mmBtu/hr)	NO _x Emissions Limitation (lb/mmBtu) or Requirement
Natural Gas	Industrial boiler greater than 100	0.08
Distillate Oil	Industrial boiler greater than 100	0.10

ii. Compliance Method (35 IAC 217 Subpart D, E)

Monitoring

- A. Pursuant to IAC 217.157(a)(2), the owner or operator of a boiler with a rated heat input capacity greater than 100 mmBtu/hr but less than or equal to 250 mmBtu/hr subject to 35 IAC Part 217, Subpart E must install, calibrate, maintain, and operate a continuous emissions monitoring system on each boiler for the measurement of NO_x emissions discharged into the atmosphere in accordance with 40 CFR 60, Subpart A and Appendix B, Performance Specifications 2 and 3, and Appendix F, Quality Assurance Procedures, as incorporated by reference in Section IAC 217.104.
- B. Pursuant to 35 IAC 217.166, the owner or operator of an industrial boiler subject to the combustion tuning requirements of Section 35 IAC 217.164 must have combustion tuning performed on the boiler at least annually, starting

January 1, 2015. The combustion tuning must be performed by an employee of the owner or operator or a contractor who has successfully completed a training course on the combustion tuning of boilers firing the fuel or fuels that are fired in the boiler.

- C. Pursuant to 35 IAC 217.164(a), compliance must be demonstrated on an ozone season and annual basis.

Recordkeeping

- D. Pursuant to 35 IAC 217.156(a) through (j), the owner or operator of each boiler must maintain records that demonstrate compliance with the requirements of 35 IAC 217 Subpart D and E, which include, but are not limited to:
- I. The owner or operator of an emission unit subject to 35 IAC 217.152, must keep and maintain all records used to demonstrate initial compliance and ongoing compliance with the requirements of 35 IAC 217.152. Copies of such records must be submitted by the owner or operator of the source to the IEPA within 30 days after receipt of a written request by the IEPA. Such records must be kept at the source and maintained for at least five years and must be available for immediate inspection and copying by the IEPA.
 - II. The owner or operator of each boiler subject to 35 IAC 217 Subpart E, must maintain records that demonstrate compliance with the requirements, as applicable, that include the following:
 - Identification, type (e.g., gas-fired), and location of each unit.
 - Calendar date of the record.
 - Monthly, seasonal, and annual operating hours.
 - Type and quantity of each fuel used monthly, seasonally, and annually.
 - Reports for all applicable emissions tests for NO_x conducted on the unit, including results.
 - The date, time, and duration of any startup, shutdown, or malfunction in the operation of any emission unit subject to Subpart E, or any emissions monitoring equipment. The records must include a description of the malfunction and corrective maintenance activity.
 - A log of all maintenance and inspections related to the unit's air pollution control equipment for NO_x that is performed on the unit.
 - A log for the NO_x monitoring device, if present, including periods when not in service and maintenance and inspection activities that are performed on the device.
 - Identification of time periods for which operating conditions and pollutant data were not obtained by the continuous emissions monitoring system, including the reasons for not obtaining sufficient data and a description of corrective actions taken.

- III. The owner or operator of an industrial boiler subject to 35 IAC 217 Subpart E must maintain records in order to demonstrate compliance with the combustion tuning requirements under 35 IAC 217.166.
- IV. Pursuant to 35 IAC 217.166 (a) through (e), the owner or operator must maintain the following records that must be made available to the Illinois EPA upon request:
- The date the combustion tuning was performed;
 - The name, title, and affiliation of the person who performed the combustion tuning;
 - Documentation demonstrating the provider of the combustion tuning training course, the dates the training course was taken, and proof of successful completion of the training course;
 - Tune-up procedure followed and checklist of items (such as burners, flame conditions, air supply, scaling on heating surface, etc.) inspected prior to the actual tune-up; and
 - Operating parameters recorded at the start and at conclusion of combustion tuning.

Attachment 1 - List of Emission Units at This Source

Section	Emission Units	Description
4.1	Boilers	Three natural gas fired boilers supply steam for the needs of this source.
4.2	Soap and Refined Glycerine Production Lines	The raw materials used in the production of bar soap includes fats (tallow, coco, and palm oil), sodium hydroxide (NaOH), potassium hydroxide (KOH), superfat a stabilizer) preservatives, salt, polymers, perfumes, germicides, and other additives (colors). The fats /oils require processing to convert them into the actual soap raw material, fatty acids. In the conversion process, glycerine is produced as a by-product. This glycerine is refined along with purchased crude glycerine to make a saleable product. The fatty acids are combined with the other raw materials and vacuum dried into pellets. The pellets are combined with various slurries (blends of perfumes, colors, germicides, etc) to create the different products lines of bar soap. The blends are formed into bars and packaged for shipment.
4.3	Antiperspirant/Deodorant (APDO) Products Manufacturing Lines	Two Antiperspirant/Deodorant (APDO) products manufacturing lines (Lines 11 and 12) consisting of bulk material storage tanks, process tanks for loading, blending, and holding of blended products, cartridge type dust collectors, and ancillary operations, as described in the above -referenced application.
4.4	Talc Storage Silo and Scale Hopper	Talc Storage Silo and Scale Hopper

Attachment 2 - Acronyms and Abbreviations

acfm	Actual cubic feet per minute
ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment trading unit
BACT	Best Available Control Technology
BAT	Best Available Technology
Btu	British Thermal Units
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAIR	Clean Air Interstate Rule
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CISWI	Commercial Industrial Solid Waste Incinerator
CO	Carbon monoxide
CO ₂	Carbon dioxide
COMS	Continuous Opacity Monitoring System
CPMS	Continuous Parameter Monitoring System
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
ERMS	Emissions Reduction Market System
°F	Degrees Fahrenheit
GHG	Green house gas
GACT	Generally Acceptable Control Technology
gr	Grains
HAP	Hazardous air pollutant
Hg	Mercury
HMIWI	Hospital medical infectious waste incinerator
hp	Horsepower
hr	Hour
H ₂ S	Hydrogen sulfide
I.D. No.	Identification number of source, assigned by IEPA
IAC	Illinois Administrative Code
ILCS	Illinois Compiled Statutes
IEPA	Illinois Environmental Protection Agency
kw	Kilowatts
LAER	Lowest Achievable Emission Rate
lbs	Pound

VVF Illinois Services, LLC
I.D. No.: 089800AAH
Permit No.: 96030154

Date Received: 04/06/2007
Date Issued: TBD

m	Meter
MACT	Maximum Achievable Control Technology
M	Thousand
MM	Million
mos	Month
MSDS	Material Safety Data Sheet
MSSCAM	Major Stationary Sources Construction and Modification (Non-attainment New Source Review)
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
PB	Lead
PEMS	Predictive Emissions Monitoring System
PM	Particulate matter
PM ₁₀	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PM _{2.5}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
PSD	Prevention of Significant Deterioration
PSEU	Pollutant-Specific Emission Unit
psia	Pounds per square inch absolute
PTE	Potential to emit
RACT	Reasonable Available Control Technology
RMP	Risk Management Plan
scf	Standard cubic feet
SCR	Selective catalytic reduction
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile organic material

Attachment 3 - Contact and Reporting Addresses

<p>IEPA Compliance Section</p> <p>IEPA Stack Test Specialist</p> <p>IEPA Air Quality Planning Section</p> <p>IEPA Air Regional Field Operations Regional Office #1</p> <p>IEPA Permit Section</p>	<p>Illinois EPA, Bureau of Air Compliance & Enforcement Section (MC 40) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Compliance Section Source Monitoring - Third Floor 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Air Quality Planning Section (MC 39) 1021 North Grand Avenue East P.O. Box 19276 Springfield, Illinois 62794-9276</p> <p>Phone No.: 217/782-2113</p>
	<p>Illinois EPA, Bureau of Air Regional Office #1 9511 Harrison Street Des Plaines, Illinois 60016</p> <p>Phone No.: 847/294-4000</p>
	<p>Illinois EPA, Bureau of Air Permit Section (MC 11) 1021 North Grand Avenue East P.O. Box 19506 Springfield, Illinois 62794-9506</p> <p>Phone No.: 217/785-1705</p>
<p>USEPA Region 5 - Air Branch</p>	<p>USEPA (AR - 17J) Air and Radiation Division 77 West Jackson Boulevard Chicago, Illinois 60604</p> <p>Phone No.: 312/353-2000</p>

Attachment 4 - Example Certification by a Responsible Official

SIGNATURE BLOCK	
NOTE: THIS CERTIFICATION MUST BE SIGNED BY A RESPONSIBLE OFFICIAL. APPLICATIONS WITHOUT A SIGNED CERTIFICATION WILL BE DEEMED AS INCOMPLETE.	
I CERTIFY UNDER PENALTY OF LAW THAT, BASED ON INFORMATION AND BELIEF FORMED AFTER REASONABLE INQUIRY, THE STATEMENTS AND INFORMATION CONTAINED IN THIS APPLICATION ARE TRUE, ACCURATE AND COMPLETE. ANY PERSON WHO KNOWINGLY MAKES A FALSE, FICTITIOUS, OR FRAUDULENT MATERIAL STATEMENT, ORALLY OR IN WRITING, TO THE ILLINOIS EPA COMMITS A CLASS 4 FELONY. A SECOND OR SUBSEQUENT OFFENSE AFTER CONVICTION IS A CLASS 3 FELONY. (415 ILCS 5/44(H))	
AUTHORIZED SIGNATURE:	
BY: _____	_____
AUTHORIZED SIGNATURE	TITLE OF SIGNATORY
_____	_____/_____/_____
TYPED OR PRINTED NAME OF SIGNATORY	DATE

VVF Illinois Services, LLC
I.D. No.: 089800AAH
Permit No.: 96030154

Date Received: 04/06/2007
Date Issued: TBD